

REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

By the foregoing amendment, claims 1 and 5 have been amended and claim 4 canceled. No new matter has been added. Claims 10 and 13-16 have been withdrawn from consideration. Thus, claims 1-3, 5-9, and 11-12 are currently pending in the application and subject to examination.

In the Office Action mailed February 10, 2006, the Examiner objected to Figure 1 and Figure 2, asserting that they should be labeled "Prior Art". A replacement sheet for Figure 2 is submitted responsive to this objection. Regarding Figure 1, the Applicants respectfully traverse this objection. Figure 1 is not Prior Art. The amplifier/noise cancel circuit, 6, of Figure 1 is novel and is shown throughout Figures 3-6. Therefore, the Applicants request the withdrawal of the objection to Figure 1.

The Examiner claims 1-4 under 35 U.S.C. § 102(b) as being anticipated by Panicacci et al. (Programmable Multiresolution CMOS Active Pixel Sensor) ("Panicacci") with Mendis et al. (Progress in CMOS Active Pixel Image Sensors) ("Mendis") providing supporting documentation based on an incorporation by reference; and claims 1-5 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,949,483 to Fossum et al. ("Fossum"). The Examiner objected to claims 6-9, and 11-12 as being dependent on a rejected claim, but asserted that they would be allowable if rewritten in independent form. It is noted that claims 1 and 5 have been amended. To the extent that the rejections remain applicable to the claims currently pending, the Applicant hereby traverses the rejections as follows.

The Applicants' invention as now set forth in claim 1 is directed to an X-Y address type solid-state image pickup device including a noise cancel circuit for removing a noise superimposed on the image data and an image averaging circuit disposed in the noise cancel circuit for carrying out and averaging processing of the image data after the end of the noise cancel operation.

Panicacci teaches a CMOS Active Pixel Sensor array in an image averaging circuit for carrying out an averaging processing of the image data. However, the sensor circuits in Panicacci carry out the averaging processing of the image data before the noise cancel operation. (See section 2.1-2.2 and Figures 3-5 of Panicacci). Thus, Panicacci is in contrast to the invention in claim 1, where the image averaging circuit is for carrying out and averaging processing of the image data after the end of the noise cancel operation. (See section 2.1-2.2 and Figures 3-5 of Panicacci). Mendi fails to disclose an image averaging circuit. Thus, Mendi fails to cure the deficiency in Panicacci.

Fossum teaches an active pixel sensor array with an image averaging circuit. However, similar to Panicacci, the sensor circuits carry out the noise cancel operation after the averaging processing of the image data. (See column 12, line 21-column 14 line 5 of Fossum). Thus, Fossum does not disclose an image averaging circuit for carrying out and averaging processing of the image data after the end of the noise cancel operation.

Thus, the Applicants submit that both Panicacci and Fossum fail to disclose or suggest at least an X-Y address type solid state image pickup device including an

image averaging circuit for carrying out an averaging processing of the image data after the end of the noise cancel operation.

For at least this reason, the Applicants submit that claim 1 is allowable over the cited references. Claims 2-3, 5-9, and 11-12 depend from claim 1 and include further limitations. As claim 1 is allowable, the Applicants submit that claims 2-3, 5-9, and 11-12, which depend from claim 1, are likewise allowable.

CONCLUSION

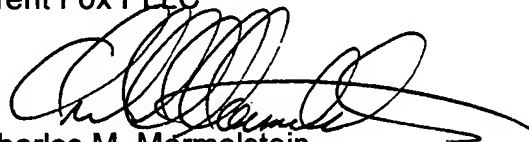
For all of the above reasons, it is respectfully submitted that the claims now pending patentability distinguish the present invention from the cited references. Accordingly, reconsideration and withdrawal of the outstanding rejections and an issuance of a Notice of Allowance are earnestly solicited.

Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is encouraged to telephone the undersigned representative at the number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. The fee for this extension may be charged to our Deposit Account No. 01-2300. The Commissioner is hereby authorized to charge any fee deficiency or credit any overpayment associated with this communication to Deposit Account No. 01-2300, with reference to Attorney Docket No. 024014-00003.

Respectfully submitted,

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